

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEBRA L. WARD, on behalf of herself and all others similarly situated,)	CASE NO. 1:22-cv-01576-CEF
)	
)	
Plaintiff,)	DEFENDANT CNB BANK’S
)	<u>UNOPPOSED</u> MOTION TO EXTEND
vs.)	RESPONSIVE PLEADING DEADLINE
)	
CNB BANK,)	
)	
Defendant.)	

Defendant CNB Bank submits this Unopposed Motion to Extend the Responsive Pleading Deadline to January 18, 2023, and as good cause in support, states as follows.

On September 7, 2022, Plaintiff filed her Complaint against CNB Bank. (Doc. 1.) On September 12, 2022, Plaintiff served CNB Bank with a copy of the Summons and Complaint. (Doc. 4.) Shortly after service of the Complaint, Plaintiff and CNB Bank engaged in ongoing discussions regarding the case and underlying facts, including early preliminary resolution discussions and a dialogue regarding whether the Complaint met subject matter jurisdiction requirements. CNB was advised that Plaintiff would be amending the Complaint, and CNB’s outside counsel agreed to accept service of an amended complaint.

On September 27, 2022, Plaintiff filed an Amended Complaint. (Doc. 6.) The Amended Complaint was served on CNB’s outside counsel on October 5, 2022. The parties have continued their discussions regarding the case and potential for preliminary resolution. As part of these discussions, CNB Bank and Plaintiff agreed to obtaining an extension until January 18, 2023, in which to file a responsive pleading, and Plaintiff does not oppose this request.

Accordingly, CNB Bank respectfully requests that it be granted an extension of time, up to and including January 18, 2023, in which to answer, move, or otherwise respond to Plaintiff's Amended Complaint.

Dated: January 6, 2023

Respectfully submitted,

/s/ David M. Krueger

David M. Krueger (OH 0085072)

**BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP**

200 Public Square, Suite 2300

Cleveland, Ohio 44114

Telephone: (216) 363-4646

Facsimile: (216) 363-4588

Email: dkrueger@beneschlaw.com

Attorneys for Defendant CNB Bank

CERTIFICATE OF SERVICE

This is to certify that the foregoing was filed electronically on this 6th day of January, 2023 in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the Court's Electronic Filing System. Parties may access this filing through the Court's Filing System.

/s/ David M. Krueger